

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**UNITED STATES POSTAL SERVICE
RESPONSES TO DAVID B. POPKIN INTERROGATORIES
(DBP/USPS-7—14)**

The United States Postal Service today files its institutional responses to the above-identified interrogatories of David B. Popkin, dated June 6, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-7.

The Postal Service has filed a number of Library References in this Docket that contain large listings of various postal facilities in the format of an Excel spreadsheet. USPS-LR-N2012-2/1 has one spreadsheet and USPS-LR-N2012-2/2 has two spreadsheets. For each of these three spreadsheets please generically describe the order of how the entries are shown vertically in the different rows.

RESPONSE

USPS-LR-N2012-2/1 is sorted by Area Name, District Name and Finance Number. The CSV_Clac.xls spreadsheet in USPS-LR-N2012-2/2 is sorted by Finance Number, and the SOV_Calc.xls spreadsheet in USPS-LR-N2012-2/2 is unsorted.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-8.

[a] Please provide insight on how the collection times at the blue collection boxes located at the post office will have their collection times affected by the changes proposed in this Docket.

[b] Please provide similar information for the collection time at blue collection boxes located at points away from the post office.

RESPONSE

[a] The Postal Service does not expect that collection times for blue collection boxes located in Post Offices will be affected by POSTPlan.

[b] The Postal Service does not expect that collection times for blue collection boxes not located in Post Offices will be affected by POSTPlan.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-9.

[a] Please provide insight into how the changes proposed in this Docket will affect the time of the dispatch from the post office to the processing center.

[b] Please provide information on how it will affect the ability of the post office to dispatch mail collected by city delivery/rural delivery/HCR delivery carriers from customers along their route to have it dispatched for processing at the processing center of the day of collection from the customer.

RESPONSE

[a] The Postal Service does not expect that the timing of the dispatch from a Post Office to a processing center will be affected by POSTPlan.

[b] The Postal Service does not expect that the timing of the dispatch of mail collected by city delivery/rural delivery/HCR delivery carriers from customers along their route will be affected by POSTPlan.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-10.

Please provide insight into how the changes proposed in this Docket will affect the times that a customer will have to pick-up mail from their post office box.

RESPONSE

See page 16 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-11.

Please provide insight into how the changes proposed in this Docket will affect the times that a customer will have to pick-up accountable or oversized mail at the post office whether addressed to a post office box or to a carrier route operated out of that office.

RESPONSE

POStPlan will result in the change of retail window service hours at many Post Offices, including the times that a customer may pick-up accountable or oversized mail from the retail window. Customers currently may receive accountable or oversized mail through options that do not involve pick-up at a Post Office retail window, and POStPlan will not impact the availability of these options.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-12.

Please provide insight into how the changes proposed in this Docket will affect the availability and times of retail service on Saturday.

RESPONSE

See pages 13 and 16 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-13.

Please provide insight into how the changes proposed in this Docket will affect the times that carriers providing delivery service at that office will leave the office to start their routes.

RESPONSE

The Postal Service does not expect that the times that carriers providing delivery service at that office will leave the office to start their routes will be affected by POSTPlan.

**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-14.

Please provide an estimate of the cost of providing service at all of the offices affected by the changes being proposed in this Docket broken down in the following categories as well as providing information on how these amounts were determined:

[a] Direct compensation of employees presently employed at these offices.

[b] Indirect compensation [such as benefits or retirement] of employees presently employed at these offices.

[c] Direct compensation of employees proposed to be employed at these offices after implementation of this Docket.

[d] Indirect compensation [such as benefits or retirement] of employees proposed to be employed at these offices after implementation of this Docket.

[e] Fixed costs [such as rent, utilities, transportation, non-employee expenses and communication] for the operation of these post offices both before and after the implementation of the Docket.

RESPONSE

Please see the forthcoming response to question 10 of Presiding Officer's Information

Request No. 1.